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Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:	Case No. 19-13273 (VFP)
IMMUNE PHARMACEUTICALS INC., <i>et al.</i> ,	Chapter 7
Debtors.	Jointly Administered
JEFFREY A. LESTER, CHAPTER 7 TRUSTEE FOR IMMUNE PHARMACEUTICALS, INC., <i>et al.</i> ,	Adv. Pro. No. 19-02033 (VFP)
Plaintiff-Appellant,	Oral Argument Requested
v.	Hearing Date: March 9, 2021 at 10:00 AM
DISCOVER GROWTH FUND, LLC,	
Defendant-Appellee.	

**NOTICE OF MOTION OF JEFFREY A. LESTER, CHAPTER 7 TRUSTEE,
FOR STAY OF PROCEEDING, OR IN THE ALTERNATIVE, FOR
STAY OF DISCOVERY AND ADJOURNMENT OF TRIAL DATE**

PLEASE TAKE NOTICE that Jeffrey A. Lester, Chapter 7 Trustee (the “Trustee”) for the bankruptcy estates of Immune Pharmaceuticals Inc. and related debtors, and Plaintiff in the above-captioned adversary proceeding, shall move before this Court on March 9, 2021 at 10:00

AM or as soon thereafter as counsel may be heard for entry of an order (i) staying this adversary proceeding pending resolution of the Trustee's appeal from this Court's "Order Denying Trustee's Motion Pursuant to F.R.B.P. 9023 for Reconsideration of Order Denying Partial Summary Judgment Under 11 U.S.C. § 510(b)," entered on July 10, 2020; or in the alternative (ii) staying discovery and adjourning the trial date pending the appeal.

PLEASE TAKE FURTHER NOTICE that the Trustee relies upon the Motion and Certification filed herewith and submits that a formal Brief is not necessary because the governing law is not complex.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule 9013-2(a), any opposition to the Motion must be filed and served within 7 days of the hearing date.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule 9013-3(d), the Motion will be decided on the papers unless opposition is filed.

Dated: Feb. 12, 2021
Livingston, New Jersey

RABINOWITZ, LUBETKIN & TULLY, LLC
Attorneys for Jeffrey A. Lester, Chapter 7 Trustee

By: /s/ Jonathan I. Rabinowitz
JONATHAN I. RABINOWITZ